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OCT 31 2023

**U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

RBM Partners LLC dba Chez  
Paree,  
Jason Hams,  
Sinetria Staples

(Write the full name of each defendant. The caption must include the names of all of the parties. Fed. R. Civ. P. 10(a). Merely listing one party and writing "et al." is insufficient. Attach additional sheets if necessary.)

## **Complaint for a Civil Case**

4:23-cv-01384-SEP

Plaintiff requests trial by jury:

Yes  No

**CIVIL COMPLAINT**

*NOTICE:*

*Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.*

*Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.*

*In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepaying fees or costs.*

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Keith McKay
Street Address	339 Avant Drive
City and County	St. Louis County
State and Zip Code	Missouri 63042
Telephone Number	314-656-6101
E-mail Address	hermeticmoor@yahoo.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	RBM Partners LLC dba Chez Paree
Job or Title	Owner
Street Address	90 Edwardsville Professional Park
City and County	Edwardsville
State and Zip Code	Illinois 62025
Telephone Number	314-361-7067
E-mail Address	info@rbm-partners.com

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)*

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. *(Include all information that applies to your case)*

### A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Securities Act of 1933, Housing and Urban and Developement Act, 12 USC 24, 31 USC 5118, 12 USC 83, Federal Reserve Act Section 29, 12 USC 93, Securities Act of 1933 Sec. 22(a), 12(a), 17(a)

### B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

### C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

#### 1. The Plaintiff(s)

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

If the defendant is an individual

The defendant, (*name*) \_\_\_\_\_, is a citizen

of the State of (*name*) \_\_\_\_\_ *Or* is a citizen

of (*foreign nation*) \_\_\_\_\_.

If the defendant is a corporation

The defendant, (*name*) \_\_\_\_\_.

is incorporated under the laws of the State of (*name*)

\_\_\_\_\_, and has its principal place of

business in the State of (*name*) \_\_\_\_\_ *Or*

is incorporated under the laws of the State of (*foreign nation*)

\_\_\_\_\_, and has its principal place

of business in (*name*) \_\_\_\_\_.

(*If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.*)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (*explain*):

### **III. Statement of Claim**

Type, or neatly print, a short and plain statement of the FACTS that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

All defendants have failed to comply with applicable federal, state, and local laws regarding securities, safety, sanitation, and fair housing, and has failed to honor securities instructions and make required repairs per the local code. The defendants have not upheld applicable federal, state, and local laws nor the terms of the security. On August 29th, 2023, Jason Hams received a registered security with instructions. Today is 10/30/2023, and this company has yet to perform in respect of my securities instructions or properly respond. On October 11th, 2023, this company then received an "opportunity to cure notice" with a 1-day grace period; and has not performed or properly responded; nor was my registered security returned to me. Also, for the last two years, there have been reoccurring issues in regard to overflowing sewage at my domicile. However, for the past 3 weeks, my basement has flooded with blackwater 3 times, and the owner has failed to make the proper permanent repairs. Sinetria refuses to contact a plumber after 4:30 p.m. citing an extra service charge against the company and has failed to take proper action in regards to the sanitation problem on behalf of the plaintiff, and due to gross negligence, myself and family are continuously exposed to noxious, uninhabitable and deplorable living conditions. RBM Partners LLC dba Chez Paree LLC have partnered with National Associations and have breached fiduciary duty and have failed to protect the public interest.

### **IV. Relief**

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

\$2,500,000.00 in damages, recoupment, enforcement of securities instructions, punitive damages, unearned interest, relocation and court costs.

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes  No

Do you claim actual damages for the acts alleged in your complaint?

Yes  No

Do you claim punitive monetary damages?

Yes  No

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$2,500,00.00 for violations and recoupment of criminally deprived property, unearned interest, punitive damages pursuant to the Federal Reserve Act civil money penalty.

#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31<sup>ST</sup> day of October, 2023.

Signature of Plaintiff(s)

